

BRAD J. SADEK, ESQUIRE
SADEK & COOPER
The Philadelphia Building
1315 Walnut Street, Suite 502
Philadelphia, PA 19107
(215)545-0008
Attorney for Debtor(s)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE: : **CHAPTER 13**
: **Mary D. Cathrall-Schellhorn** : **CASE NO.: 17-24936-JNP**
: **Debtor** : **NOTICE OF MOTION TO EXTEND THE**
: **AUTOMATIC STAY PURSUANT TO**
: **11 U.S.C §362(c) AS TO ALL CREDITORS**
: **RETURN DATE: 8/22/2017**
: **TIME: 10:00 AM**
: **ORAL ARGUMENT REQUESTED**

TO: Isabel C. Balboa, Chapter 13 Trustee
535 Route 38, Ste. 580
Cherry Hill, NJ 08002

All Creditors on Attached Proof of Service

PLEASE TAKE NOTICE that the undersigned Attorney for the Debtor shall move before the Honorable Jerrold N. Poslusny Jr., United States Bankruptcy Judge, 400 Cooper Street, 4th Floor, Camden, NJ 08101, Courtroom #4C on the 22nd day of August, 2017 at 10:00 a.m. or as soon thereafter as counsel may be heard for Motion to Extend the Automatic Stay.

The movant shall rely on the annexed Certification in support of the requested Order.

Oral argument of the Motion are hereby waived unless an Answer is timely filed by the responsive party at least seven (7) days prior to the return date hereof.

As the within Motion requests to extend the automatic stay, and the facts and/or law relied upon do not present complicated or unique questions, it is hereby submitted that no brief is necessary.

SADEK & COOPER
Attorneys for Debtor

DATED: July 25, 2017

/s/ Brad J. Sadek
BRAD J. SADEK, Esq.